

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

In Re: On-Line Oil Inc.)
Debtor) Case 09-13006
) Chapter 7

**MOTION OF GLENPOOL REAL ESTATE PARTNERS LLC
FOR RELIEF FROM AUTOMATIC STAY
** AND FOR ORDER
REQUIRING TRUSTEE TO ABANDON PROPERTY
AND NOTICE AND OPPORTUNITY FOR HEARING**

COMES NOW Glenpool Real Estate Partners LLC by and through its attorney, Chris M. Hunt, of Chris M. Hunt, PLLC, and moves this Court pursuant to 11 U.S.C. §554 to require the Trustee herein to abandon the property described hereinafter and further pursuant to §362 (d) for relief from the automatic stay previously entered herein. In support of this Motion, the Creditor would show to the Court as follows, to-wit:

- (1) Glenpool is the owner of a parcel of real estate located in Tulsa county, Oklahoma more particularly described as follows: southeast quarter (se/4) of section 12, T 17N, R 12 East, of Tulsa County.
- (2) On September 16, 2004, in cause PD No 970000297 the Oklahoma Corporation Commission (OCC) issued an order allowing the moveant to plug and abandon certain oil and/or gas wells located on movants property as a result of Debtors failure to produce from said wells.
- (3) Subsequently, the movant attempted to plug said well pursuant to the OCC order however the Debtor attempted to interfere with the plugging of the wells.
- (4) On April 20, 2005, the movant filed a petition in Tulsa County District Court, Case No. 2005-2352 requesting damages and temporary restraining order and temporary and permanent injunctive relief.
- (5) The Debtor thereafter answered the movants petition and filed a counter claim.
- (6) On November 21, 2006, the Court issued a temporary restraining order against the Debtor.
- (7) The Debtor subsequently appealed and on February 8, 2008, the Oklahoma Court of Appeals dismissed the Debtors appeal as moot.
- (8) On July 16, 2008, the Debtor filed a lis pendens which encumbered the movants real property which is currently being developed for residential use.

- (9) Simultaneous to the above, the Debtor filed Case No. CJ 2005-1230 against the movants, arguing the very same issues as in CJ 2005-2352. In fact the two cases were consolidated. Likewise, in that case the Debtor filed a lis pendens against the movant. The Tulsa County District Court in that case discharged lis pendens. Doc #2008074075
- (10) On June 5, 2009, the Debtor file for protection under Chapter 7 of the United States Bankruptcy Code.

Glenpool therefore requests this Court enter its order terminating the stay with regard to the property described above pursuant to 11 U.S.C. §362 (d) (1) and (2); for the Trustee to abandon said property and to allow Glenpool to seek a discharge of the lis pendens (Doc # 2008674074) from the Tulsa County District Court.

GLENPOOL REAL ESTATE PARTNERS LLC

By: /s/ Chris M. Hunt 

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CERTIFICATE OF MAILING

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was mailed to On-Line Oil Inc., 4133 N. Lincoln Blvd., Oklahoma City, OK 73105 and electronic notice/service of the above and foregoing instrument was given by the Court to David M. Roberts, Affiliated Legal Services, Inc., attorney for the Debtors; and to Lyle R. Nelson, Trustee on this 31st day of July 2009.

/s/ Chris M. Hunt 

ATTENTION: You are hereby notified that you have 15 days from the date of filing of this motion to file a written response or objection to the requested relief. If no response or objection is timely filed the Court may grant the requested relief without further notice. Rule 9006 (f) Fed. Rules Bankruptcy Procedure allows an additional 3 days to respond if this notice is served by mail.